

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re: PAUL PHILLIP FLOURNOY,

Debtor.

**Case No. 08-36697-KRH
Chapter 13**

**1101 Huntersdell Terrace
Richmond, VA 23235**

Last 4 digits of SSN: 4625

**MOTION TO WITHDRAW §1328 CERTIFICATION
AND TO VACATE DISCHARGE**

This day comes, Paul Phillip Flournoy, by counsel, and moves the Court to withdraw his §1328 certification and vacate his discharge and in support thereof states as follows:

1. That he filed the above captioned Chapter 13 bankruptcy on December 31, 2008.
2. That he had previously filed a Chapter 7 bankruptcy on October 13, 2005, and received a discharge on January 30, 2006.
3. That as a result of the prior bankruptcy discharge he was not entitled to and did not expect the Court to issue a discharge in the instant case.
4. That he inadvertently filed a §1328 Certification through counsel.

Richard O. Gates, Esq.
GATES LAW OFFICES
State Bar No. 13857
P.O. Box 187
Chesterfield, VA 23832
804-748-0382
804-748-6349 (facsimile)

WHEREFORE, your debtor prays that Court to enter an order withdrawing his §1328 certificate and vacate the discharge entered in this matter.

Respectfully submitted,

PAUL PHILLIP FLOURNOY

By: /s/ Richard O. Gates
Counsel

Richard O. Gates, Esq.
GATES LAW OFFICES
State Bar No. 13857
P.O. Box 187
Chesterfield, VA 23832
804-748-0382
804-748-6349 (facsimile)

CERTIFICATE OF SERVICE

I certify that on May 29, 2013, a copy of the foregoing was mailed via first class mail, postage prepaid, to all creditors and parties in interest as set forth on the attached mailing matrix.

/s/ Richard O. Gates

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NOTICE OF MOTION

The above Debtor has filed papers with the Court to request an Order withdrawing debtor's §1328 certification and to vacate discharge.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1:

Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

You must also mail a copy to:

Richard O. Gates
P. O. Box 187
Chesterfield, VA 23832

Richard O. Gates, Esq.
GATES LAW OFFICES
State Bar No. 13857
P.O. Box 187
Chesterfield, VA 23832
804-748-0382
804-748-6349 (facsimile)

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

PAUL PHILLIP FLOURNOY

By: /s/ Richard O. Gates
Counsel

Richard O. Gates, Esq.
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State Bar No. 13857
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/s/ Richard O. Gates

AHMSI Servicing
P. O. Box 631730
Irving, TX 75063

Chippenham JW Med Ctrs
P. O. Box 13620
Richmond, VA 23225-8620

Gloria Hall
2957 Galena Avenue
Richmond, VA 23237

American Balalaika
Symphony
3811 North 14th Street
Arlington, VA 22201

Cross Auto
3360 Anderson Highway
Powhatan, VA 23139

HSBC Card Services
P. O. Box 17051
Baltimore, MD 21297-1051

Americredit
P. O. Box 183593
Arlington, TX 76096

David W. Schneider
221 Harwick Drive
Richmond, VA 23236

Idearc Media
P. O. Box 619810
Dallas, TX 75261

Carl M. Bates, Trustee
P. O. Box 1819
Richmond, VA 23218

First Premier Bank
P. O. Box 5147
Sioux Falls, SD 57117

Juniper Bank
P.O. Box 13337
Philadelphia, PA 19101

CGI Insurance
300 Burnett Street
Fort Worth, TX 76102

GE Money Bank
P. O. Box 960061
Orlando, FL 32896

Leonard W. Tuck, Jr.
2060 Buford Road
Richmond, VA 23235

Chesterfield Bonding
11300 Hull Street Road
Midlothian, VA 23112

GE Money Bank
P.O. Box 960061
Orlando, FL 32896

Lowe's
P.O. Box 530914
Atlanta, GA 30353-0914

Northside Electric
c/o Derrick Rosser, P.C.
211- England Street
Ashland, VA 23005

Orchard Bank
P. O. Box 7044
Anaheim, CA 92850

Virginia Emergency Phys.
P. O. Box 17694
Baltimore, MD 21297

Office of the U.S.
Trustee
701 E. Broad St., Suite
4300
Richmond, VA 23219

Sam'e Club
P. O. Box 530942
Atlanta, GA 30353

Washington Mutual
P. O. Box 660487
Dallas, TX 75266

Treas., Chesterfield
County
P. O. Box 70
Chesterfield, VA 23832

Yellow Book USA
P. O. box 619810
Dallas, TX 75261